

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

CIVIL ACTION No. 04-11492-REK

MARIO LACY,  
Plaintiff,

v.

CITY OF BOSTON, WILLIAM  
FEENEY, KENNETH HEARNS  
and JUAN J. SEOANE,  
Defendants.

**PARTIES' JOINT STATEMENT PURSUANT TO LR 16.1**

Pursuant to the Court's Notice of Scheduling Conference and Rule 16.1(D) of the Local Rules of the United States District Court for the District of Massachusetts, counsel for the above named parties have conferred and propose the following pretrial schedule:

**I. Schedule**

**A. Discovery Schedule**

The parties propose the following discovery schedule:

1. Automatic disclosures to be completed on or before November 26, 2004.
2. The parties will serve written discovery requests by January 28, 2005.
3. Plaintiff will disclose his expert(s) by May 27, 2005.  
Defendants will disclose their expert(s) by June 24, 2005.
4. Fact discovery will be completed by August 26, 2005.
5. IME of Plaintiff, if any, within 30 days after submission of Plaintiff's medical expert report.

**B. Motion Schedule**

The parties will serve motions for summary judgment no later than September 23, 2005.

**II. Trial By Magistrate Judge**

The parties have not yet agreed to a trial by a magistrate judge.

Respectfully submitted,

PLAINTIFF, MARIO LACEY  
By his Attorney:

DEFENDANTS,  
Merita A. Hopkins  
Corporation Counsel

By their attorney:

/s/ Stephen B. Hrones

/s/ Karen A. Glasgow

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